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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056362
Party	Plaintiff Milano Series International Products, Ltd.
Correspondence Address	ROBERTA S BREN OBLON SPIVAK MCCLELLAND MAIER & NEUSTADT LLP 1940 DUKE STREET ALEXANDRIA, VA 22314 UNITED STATES tmdocket@oblon.com, rbren@oblon.com, ndyson@oblon.com
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Date	01/13/2014
Attachments	92056362-Petitioner Second Motion to Compel and Suspend.pdf(2004783 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

MILANO SERIES INTERNATIONAL  
PRODUCTS, LTD.,

Petitioner,

 $\mathbf{v}_i$ 

MILANO BAGS INC.

Respondent.

Cancellation No. 92/056362  
Supplemental Registration No. 4,215,599  
Mark: MILANO BAGS

**PETITIONER'S SECOND MOTION TO COMPEL RESPONDENT TO FULLY AND COMPLETELY RESPOND TO CERTAIN OF PETITIONER'S FIRST SET OF INTERROGATORIES AND CERTAIN OF PETITIONER'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, THINGS AND ELECTRONICALLY STORED INFORMATION PURSUANT TO TRADEMARK RULE 2.120(e)**

and

**MOTION TO SUSPEND PENDING RESPONDENT PROVIDING PROPER  
DISCOVERY RESPONSES TO PETITIONER**

Milano Series International Products, Ltd. (“Petitioner”), moves the Trademark Trial and Appeal Board (“Board”) under Trademark Rule 2.120(e) and Rules 33, 34 and 37(a) of the Federal Rules of Civil Procedure, to order that Milano Bags, Inc. (“Respondent”) completely and fully respond to certain of Petitioner’s First Set of Interrogatories, and completely and fully respond to certain of Petitioner’s First Request for Production of Documents, Things and

Electronically Stored Information.<sup>1</sup> Respondent's attorney has been unresponsive to Petitioner's attorney's numerous and varied attempts to resolve the issues contained in this Motion.

Petitioner also moves that the Board suspend the cancellation proceeding until Petitioner receives Respondent's proper and full responses to the discovery requests involved in Petitioner's Second Motion to Compel.

**Petitioner's Second Motion to Compel**

Petitioner's First Set of Interrogatories and Petitioner's First Request for Production of Documents, Things and Electronically Stored Information were served on Respondent on January 14, 2013, making Respondent's responses due February 18, 2013.

On the due date, Respondent served its Responses to Petitioner's First Set of Interrogatories, and its Responses to Petitioner's First Request for Production of Documents, Things and Electronically Stored Information.

As explained and documented in Petitioner's first Motion to Compel filed April 17, 2013, there were numerous deficiencies and problems with Respondent's Responses, and Petitioner's attorney could not obtain Respondent's attorney's cooperation to discuss the discovery issues raised by Respondent's Responses. In a July 2, 2013 order, the Board denied Petitioner's first Motion to Compel, but specifically noted several deficiencies in Respondent's Responses (for example, the interrogatory answers are not under oath and that several answers do not answer the question posed), and ordered Respondent's attorney to make himself available for a conference with Petitioner's attorney.

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<sup>1</sup> The cancellation proceeding is currently suspended through March 6, 2014 on the basis of the January 13, 2014 Board order granting Petitioner's Consented Motion to Suspend (filed December 4, 2013).

Because Respondent's attorney remained uncommunicative, Petitioner requested a telephone conference with a Board interlocutory attorney regarding Respondent's discovery Responses. Respondent's attorney called Petitioner's attorney when ordered to do so by the Board interlocutory attorney and a telephone discussion concerning Respondent's Responses was then scheduled. That telephone conference between the parties' attorneys was held on September 6, 2013. (Mr. Baxley was advised via a September 4, 2013 email from Respondent's attorney of the scheduled conference.)

As agreed to in the September 6, 2013 telephone conference, Respondent mailed its First Supplemental Responses to Petitioner's First Set of Interrogatories and Respondent's First Supplemental Responses to Petitioner's First Request for Production of Documents, Things and Electronically Stored Information to Petitioner's attorney on October 4, 2013. After reviewing the Responses, on October 14, 2013 and October 16, 2013, Petitioner's attorney emailed Respondent's attorney regarding Respondent's continued discovery deficiencies. (Exhibit 1) There were several email exchanges through October 20, 2013 between the parties' attorneys necessitated by Respondent's attorney being unwilling to discuss Respondent's Supplemental Responses in a telephone conference with Petitioner's attorney until the specifics were set forth in writing by Petitioner's attorney. (Exhibit 2)

Although Petitioner did not believe it was incumbent for it to do so, and felt a telephone conference would be more expedient and fruitful, Petitioner's attorney set forth in writing in a November 4, 2013 email to Respondent's attorney (Exhibit 3) the specific deficiencies in Respondent's Supplemental Responses to Petitioner's first written discovery requests (served on Respondent on January 14, 2013). Petitioner's counsel followed up with December 2 and December 3, 2013 emails to Respondent's attorney. On December 3, 2013 Respondent's

attorney agreed to a further suspension, but made no statement regarding Respondent's deficient discovery responses. (Exhibit 4) Petitioner's attorney specifically requested a response regarding the discovery issues in December 4 and December 10, 2013 emails. (Exhibit 5) Subsequent to December 3, 2013, Petitioner's attorney has not received any communication of any kind from Respondent's attorney.

Petitioner has made a good faith effort as required by Trademark Rules 2.120(e)(1) to obtain full and complete responses to its First Set of Interrogatories, and its First Request for Production of Documents, Things and Electronically Stored Information. TBMP §§523.02 (June 2013). Despite Petitioner's many attempts to resolve the issues by phone and in writing, including the November 4, 2013 email specifying Respondent's discovery response deficiencies, and follow-up communications, proper and complete discovery responses have not been provided. The remaining issues are discussed below.

*Petitioner's First Set of Interrogatories – to be answered under oath*

Respondent's original interrogatory answers and its supplemental answers were not signed under oath by Respondent by an authorized and knowledgeable corporate representative as required by Fed.R.Civ.P. Rules 33(b)(3) and (5). Respondent should be ordered to provide its original answers, and first supplemental answers, as well as any further supplemental answers to Petitioner's First Set of Interrogatories under oath.

*Specific Deficiencies in Respondent's Supplemental Answers to Petitioner's First Set of Interrogatories*

**Respondent's Supplemental Answers to Interrogatory Nos. 2, 3, 12 and 16 are insufficient as Respondent does not identify the persons named in accordance with Petitioner's "Definitions and Instructions" Section E. Identifying individuals residing in Peru as "Principals" does not appear to be accurate for Milano Bags, Inc. a Florida corporation. Further supplemental interrogatory answers should be ordered.**

**INTERROGATORY NO. 2.**

Identify those persons most knowledgeable of the actual or intended marketing, advertising, distribution, and/or sale of Respondent's Products under Respondent's Mark.

**ANSWER:**

Registrant objects to this Instant Interrogatory on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

Ana Silvana Diaz Suarez and Andres Haaker Velaochaga are the owners of the company.

**SUPPLEMENTAL ANSWER:**

Ana Silvana Diaz Suarez  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru

Andres Haaker Velaochaga  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru

**INTERROGATORY NO. 3.**

Identify the person(s) who conceived of Respondent's Mark.

**ANSWER:**

Registrant objects to this Instant Interrogatory on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

Ana Silvana Diaz Suarez and Andres Haaker Velaochaga are the owners of the company. The brand was created in Peru.

**SUPPLEMENTAL ANSWER:**

Ana Silvana Diaz Suarez  
Principal

Jr Salaverry 1588, Surquillo.  
Lima 34, Peru

Andres Haaker Velaochaga  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru

**INTERROGATORY NO. 12.**

Identify the most knowledgeable person(s) regarding any market research (including, but without limitation, surveys, studies, investigations and/or focus group inquiries) conducted by or on behalf of Respondent regarding Respondent's Mark.

**ANSWER:**

Registrant objects to this Instant Interrogatory on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

There is no person knowledgeable about market research.

**SUPPLEMENTAL ANSWER:**

Ana Silvana Diaz Suarez  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru

Andres Haaker Velaochaga  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru

**INTERROGATORY NO. 16.**

Identify each person who participates in creating or distributing advertisements or promotions for Respondent's Products in connection with Respondent's Mark, and state the period of time during which each person participated in such activities.

**ANSWER:**

Registrant objects to this Instant Interrogatory on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

Ana Silvana Diaz Suarez and, Andres Haaker Velaochaga. The promotions are made during the shoe trade shows.

**SUPPLEMENTAL ANSWER:**

Ana Silvana Diaz Suarez  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru  
2007 to the present.

Andres Haaker Velaochaga  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru  
2007 to the present.

**Respondent's Supplemental Answer to Interrogatory No. 17 is also insufficient as Respondent does not identify the persons named in accordance with Petitioner's "Definitions and Instructions" Section E. Identifying individuals residing in Peru as "Principals" does not appear to be accurate for Milano Bags, Inc. a Florida corporation. In addition, the Supplemental Answer identifies a third person, but no corporate title or position was provided for him. Further, the "counsel" who assisted are not identified. A further supplemental interrogatory answer should be ordered.**

**INTERROGATORY NO. 17.**

Identify each person who supplied documents or information for, or who has participated in responding to, these Interrogatories, and Petitioner's First Request for Production of Documents, Things and Electronically Stored Information

**ANSWER:**

Registrant objects to this Instant Interrogatory on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

Ana Silvana Diaz Suarez, Andres Haaker Velaochaga, and Juan Ferriera, with the assistance of counsel.

**SUPPLEMENTAL ANSWER:**

Ana Silvana Diaz Suarez  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru

Andres Haaker Velaochaga  
Principal  
Jr Salaverry 1588, Surquillo.  
Lima 34, Peru



Juan Ferriera  
13087 SW, 187<sup>th</sup> Street  
Miami, FL 33177

*Specific Deficiencies in Respondent's Supplemental Responses to Petitioner's First Request for Production of Documents, Things and Electronically Stored Information*

**Respondent's Supplemental Answers for Request Nos. 1 and 9 state "None" even though Respondent's Answer to Petitioner's Interrogatory No. 1 refers to a contract between Studio Moda SAC and Respondent, Milano Bags, Inc.<sup>2</sup> Further supplemental answers to the requests should be ordered.**

**REQUEST NO. 1**

Produce each document, thing and/or electronically stored information which is identified in response to Petitioner's First Set of Interrogatories to Respondent.

**ANSWER:**

Registrant objects to this Instant Request on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

Please see the attached.

**SUPPLEMENTAL ANSWER:**

None.

**REQUEST NO. 9**

Produce each document, thing and/or electronically stored information regarding each actual or intended assignment, consent, authorization, license and/or permission to use Respondent's Mark granted to Respondent, including all amendments and modifications thereof.

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<sup>2</sup> Petitioner's Interrogatory No. 1 reads: "State the address of each location at which Respondent maintains a place of business, and briefly state the nature of Respondent's principal business."

Respondent's Answer to Petitioner's Interrogatory No. 1 reads: "Registrant objects to the Instant Interrogatory on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states: Milano Bags, Inc. maintains a principal place of business in Miami, Florida. The address is 13087 SW, 187th Street, Miami, FL 33177. Milano Bags, Inc. is the distributor of Milano Bag products in the United States. The company, Studio Moda SAC is a Peruvian company who produces and distributes the Milano Bag products in Peru, Ecuador, Bolivia, Costa Rica, Caribbean Islands, Russia, and Nigeria. Studio Moda SAC has a contract with Milano Bags, Inc. to have the rights to commercialize and register the Milano Bags brand in the United States."

Respondent did not provide a supplemental Answer to this Interrogatory.

**ANSWER:**

Registrant objects to this Instant Request on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

Registrant does not license its mark to any other party.

**SUPPLEMENTAL ANSWER:**

None.

**Respondent's Supplemental Answers to Request Nos. 10 and 11 are insufficient because the documents now specified as responsive to this Request include illegible documents, as well as documents which are labels, tags, etc., but do not include the reverse side of each such label, tag, etc. Examples of such inadequate documents are set forth in Petitioner's Exhibit No. 6 (illegible documents) and Exhibit No. 7 (one side of labels, tags, etc.). Further supplemental answers to the requests should be ordered.**

**REQUEST NO. 10.**

Produce representative sample labels, tags, packaging, brochures, promotional items, and the like, for Respondent's Products that bear Respondent's Mark.

**ANSWER:**

Registrant objects to this Instant Request on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

Please see the attached.

**SUPPLEMENTAL ANSWER:**

000008-000037, 000045-000072.

**REQUEST NO. 11**

Produce representative specimens of current and/or proposed advertising or promotional documents and electronic media that bear Respondent's Mark.

**ANSWER:**

Registrant objects to this Instant Request on the grounds that it is overly broad and burdensome. Subject to said objection, Registrant states:

Please see the attached.

**SUPPLEMENTAL ANSWER:**

000008-000016, 000020-000034, 000054-000067, 000072.

\*\*\*\*

As is apparent from the above, Respondent continues to provide non-responsive and evasive answers to Petitioner's specific written discovery requests seeking documents and information about, *inter alia*, ownership of the mark MILANO BAGS, and Respondent's use of the mark on each of Respondent's Products. Under Fed.R.Civ.P. 26 Petitioner is entitled to the information and documents requested through its First Set of Interrogatories and First Request for Production of Documents, Things and Electronically Stored Information. The failure to provide the initial and supplemental responses under oath by a clearly identified officer of Applicant despite months of Petitioner's counsel's communications requesting same is not inadvertent or accidental. Rather, it appears to be calculated to avoid revealing information and documents to which Petitioner is clearly entitled. The information and documents requested relate to the alleged ownership and use of the mark, and Petitioner's ability to depose the appropriate and knowledgeable individuals in the United States. Respondent's counsel's unwillingness to communicate with Petitioner's counsel regarding the inconsistencies and failure to provide interrogatory responses under oath, results in additional costs to Petitioner and has caused what should otherwise be unnecessary involvement by the Trademark Trial and Appeal Board.

Petitioner respectfully requests that Respondent be ordered to provide further supplemental Answers to Petitioner's involved discovery requests.

**Petitioner's Motion to Suspend Discovery and Trial Dates**

Petitioner served its first discovery requests on Respondent on January 14, 2013, very early in the discovery period, which opened on January 2, 2013. Petitioner has not yet received full and complete and properly verified responses thereto from Respondent, despite Petitioner's efforts. Although the proceeding is already suspended through March 6, 2014, Petitioner is

aware there will be a delay due to the necessity of Petitioner having to file its Second Motion to Compel. In view of Respondent's failure to provide proper and full responses as outlined in this Second Motion to Compel, Petitioner requests the cancellation proceeding be suspended until Petitioner receives the documents and information requested in Petitioner's Second Motion to Compel.

In summary, Petitioner respectfully requests that the Board:

(1) grant Petitioner's Motion to Compel by:

(i) ordering Respondent to provide Respondent's original (February 18, 2013) answers to Petitioner's First Set of Interrogatories under oath;

(ii) ordering Respondent to provide Respondent's Supplemental (October 4, 2013) answers to Petitioner's First Set of Interrogatories under oath;

(iii) ordering Respondent to fully and completely respond to Petitioner's First Set of Interrogatories Nos. 2, 3, 12, 16 and 17, and to provide these answers under oath; and

(iv) ordering Respondent to fully and completely respond to Petitioner's First Request for Production of Documents, Things and Electronically Stored Information Nos. 1, 9, 10 and 11;

(2) order suspension of the cancellation proceeding until Petitioner receives the documents and information requested in Petitioner's Second Motion to Compel.

Respectfully submitted,

MILANO SERIES INTERNATIONAL  
PRODUCTS, LTD.

By: Roberta S. Bren

Roberta S. Bren  
Beth A. Chapman  
Oblon, Spivak, McClelland,  
Maier & Neustadt, L.L.P.  
1940 Duke Street  
Alexandria, Virginia 22314  
(703) 413-3000  
fax (703) 413-2220  
e-mail: [tmdocket@oblon.com](mailto:tmdocket@oblon.com)

Date: January 13, 2014

Counsel for Petitioner

RSB/BAC/cli/mjo {9572592\_1.DOC}

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing **Petitioner's Second Motion to Compel Respondent to Fully and Completely Respond to Certain of Petitioner's First Set of Interrogatories and Certain of Petitioner's First Request for Production of Documents, Things and Electronically Stored Information Pursuant to Trademark Rule 2.120(e) and Motion to Suspend Pending Respondent Providing Proper Discovery Responses to Petitioner** was served on counsel for Respondent, this 13th day of January, 2014, by sending same via First Class mail, postage prepaid, to:

MATTHEW H SWYERS  
THE TRADEMARK COMPANY PLLC  
344 MAPLE AVENUE WEST SUITE 151  
VIENNA, VA 22180



Carlette Lisenby

# **EXHIBIT 1**

## Nicole M. Dyson

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**From:** Robin Bren  
**Sent:** Wednesday, October 16, 2013 7:36 PM  
**To:** 'Matthew H. Swyers'  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '406676US \_ MILANO BAGS E\_Mails <{F3578531}.iManageDB@dms.oblon.com>'  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]  
  
**Importance:** High

Dear Matt:

I have not received any response to my communication below-- not even an acknowledgement of receipt. I tried to call your office at Phone (800) 906-8626 x100, and the message is that the mailbox is full. First and foremost, I hope that the lack of a response and inability for me to leave a telephone message is not because of illness or the like.

I would like to discuss the continued deficiencies. However, in the absence of a response from you regarding your availability, I will be contacting the Board next week to again request the Board's intervention—with the participation of both parties.

Regards, Robin

Robin Bren  
Oblon Spivak  
(703)412-6413

---

**From:** Robin Bren  
**Sent:** Monday, October 14, 2013 11:22 AM  
**To:** 'Matthew H. Swyers'  
**Cc:** Beth A. Chapman; Nicole M. Dyson; 406676US \_ MILANO BAGS E\_Mails <{F3578531}.iManageDB@dms.oblon.com>  
**Subject:** Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]  
**Importance:** High

Our file: 406676US

Dear Matt:

Please let me know what day and time you are available this week to discuss the "supplemental" discovery responses that were sent to us on October 4, 2013.

As you are no doubt aware, there are still substantial problems/issues.

In the meantime, please confirm receipt of this email.

Regards, Robin

Robin Bren  
Oblon Spivak  
(703)412-6413





# **EXHIBIT 2**

## Nicole M. Dyson

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**From:** Robin Bren  
**Sent:** Sunday, October 20, 2013 7:50 PM  
**To:** 'Matthew H. Swyers'  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '{F3578531}.iManageDB@dms.oblon.com'  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]

**Importance:** High

Dear Matt:

Per our prior email communications, please let me know when you are available for a telephone discussion regarding the discovery responses.

Regards, Robin

---

**From:** Robin Bren  
**Sent:** Thursday, October 17, 2013 9:04 PM  
**To:** 'Matthew H. Swyers'  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '{F3578531}.iManageDB@dms.oblon.com'  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]

Dear Matt:

This will confirm receipt of and thank you for your email below.

We believe it will be more productive and it is in keeping with the Board's prior directive. Accordingly, please let us know your availability.

Regards, Robin

---

**From:** Matthew H. Swyers [<mailto:mswyers@thetrademarkcompany.com>]  
**Sent:** Thursday, October 17, 2013 9:01 PM  
**To:** Robin Bren  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '{F3578531}.iManageDB@dms.oblon.com'  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]

I would simply like a proffer as to why a further call is needed.

Thank you

Matt Swyers

---

**From:** Robin Bren [<mailto:RBren@oblon.com>]  
**Sent:** Thursday, October 17, 2013 1:01 PM  
**To:** 'Matthew H. Swyers'  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '{F3578531}.iManageDB@dms.oblon.com'  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]

Dear Matt:

Thank you for your prompt response. Please let me know if this means that you are not willing to discuss this by phone next week.

Regards, Robin

---

**From:** Matthew H. Swyers [<mailto:mswyers@thetrademarkcompany.com>]  
**Sent:** Thursday, October 17, 2013 12:57 PM  
**To:** Robin Bren  
**Cc:** Beth A. Chapman; Nicole M. Dyson; {F3578531}.iManageDB@dms.oblon.com  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]

Robin:

Thank you for your email. If I did not satisfy what we had agreed to over the phone it should be relatively simple for you to let me know via email. Just let me know at your convenience and I will take a look.

Thanks,

Matt

---

**From:** Robin Bren [<mailto:RBren@oblon.com>]  
**Sent:** Thursday, October 17, 2013 11:17 AM  
**To:** 'Matthew H. Swyers'  
**Cc:** Beth A. Chapman; Nicole M. Dyson; {F3578531}.iManageDB@dms.oblon.com  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]  
**Importance:** High

Our file: 406676US

Dear Matt:

This will confirm receipt of your email this morning.

It sounds like you are suggesting that we provide written analysis of the deficiencies, which we tried in the past, but it did not prove fruitful.

Accordingly, please let us know when next week you are available to discuss the discovery in detail.

Regards, Robin

---

**From:** Matthew H. Swyers [<mailto:mswyers@thetrademarkcompany.com>]  
**Sent:** Thursday, October 17, 2013 8:33 AM  
**To:** Robin Bren  
**Cc:** Beth A. Chapman; Nicole M. Dyson; {F3578531}.iManageDB@dms.oblon.com  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]

Robin:

Thank you for your email and your personal note. A trial in another matter has taken up a more significant amount of time than had been anticipated so I have been largely occupied with that over the past two weeks. Notwithstanding the

same, I would welcome the opportunity to hear how you feel the discovery responses that were negotiated and discussed in advance remain deficient. Simply let me know what you feel the remaining issues are and I will take a look.

Otherwise, if you feel that we need to go to the Board on the matter I will make myself available.

Thank you,

## **Matthew H. Swyers**

The Trademark Company, PLLC  
344 Maple Avenue West, PBM 151  
Vienna, VA 22180 USA  
Phone (800) 906-8626 x100  
Facsimile (270) 477-4574  
[www.TheTrademarkCompany.com](http://www.TheTrademarkCompany.com)



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**From:** Robin Bren [<mailto:RBren@oblon.com>]  
**Sent:** Wednesday, October 16, 2013 7:36 PM  
**To:** 'Matthew H. Swyers'  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '406676US \_ MILANO BAGS E\_Mails <{F3578531}.iManageDB@dms.oblon.com>'  
**Subject:** RE: Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]  
**Importance:** High

Dear Matt:

I have not received any response to my communication below-- not even an acknowledgement of receipt.

I tried to call your office at Phone (800) 906-8626 x100, and the message is that the mailbox is full.

First and foremost, I hope that the lack of a response and inability for me to leave a telephone message is not because of illness or the like.

I would like to discuss the continued deficiencies. However, in the absence of a response from you regarding your availability, I will be contacting the Board next week to again request the Board's intervention—with the participation of both parties.

Regards, Robin

Robin Bren  
Oblon Spivak  
(703)412-6413

---

**From:** Robin Bren  
**Sent:** Monday, October 14, 2013 11:22 AM

**To:** 'Matthew H. Swyers'

**Cc:** Beth A. Chapman; Nicole M. Dyson; 406676US \_ MILANO BAGS E\_Mails <{F3578531}.iManageDB@dms.oblon.com>

**Subject:** Milano Series International Products, Inc. v. Milano Bags, Inc. [IWOV-iManageDB.FID3578531]

**Importance:** High

Our file: 406676US

Dear Matt:

Please let me know what day and time you are available this week to discuss the “supplemental” discovery responses that were sent to us on October 4, 2013.

As you are no doubt aware, there are still substantial problems/issues.

In the meantime, please confirm receipt of this email.

Regards, Robin

Robin Bren

Oblon Spivak

703)412-6413

# **EXHIBIT 3**

## Nicole M. Dyson

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**From:** Robin Bren  
**Sent:** Monday, November 04, 2013 6:00 PM  
**To:** mswyers@thetrademarkcompany.com  
**Cc:** Beth A. Chapman; Nicole M. Dyson; 406676US \_ MILANO BAGS E\_Mails  
**Subject:** Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]

**Importance:** High

Our Ref: 406676US-10398-35

Dear Matt:

This is further to my October 20, 2013 email again requesting you advise me when you would be available to discuss Milano Bags' Supplemental Responses to Milano Series' First Set of Interrogatories and First Request for Production of Documents. I received no response. We do not believe that your approach is consistent with the directive from the Board.

Initially, we note the following remaining deficiencies.

Milano Series' First Set of Interrogatories- to be answered under oath

**Both** Milano Bags' original Responses and its Supplemental Responses must be signed under oath by an officer of Respondent corporation. You stated in our September 6, 2013 telephone conference that would be done. It was not.

Supplemental Response to Interrogatory No. 2 identifies two persons in Peru by name and as "Principal" being those most knowledgeable about Respondent's marketing, advertising, distribution and sale of its products under its mark. This title is unclear in terms of Respondent, Milano Bags Inc., a corporation of Florida. If the individuals identified are officers of Milano Bags, Inc., please provide their titles. If the individuals are principals of a different entity/company, please identify the entity/company.

Supplemental Response to Interrogatory No. 3 identifies two persons in Peru by name and as "Principal" being those who conceived of Respondent's mark. This title is unclear in terms of Respondent, Milano Bags Inc., a corporation of Florida. If the individuals identified are officers of Milano Bags, Inc., please provide their titles. If the individuals are principals of a different entity/company, please identify the entity/company.

Supplemental Response to Interrogatory No. 12 identifies two persons in Peru by name and as "Principal" being those most knowledgeable about any market research conducted by or on behalf of Respondent. This title is unclear in terms of Respondent, Milano Bags Inc., a corporation of Florida. If the individuals identified are officers of Milano Bags, Inc., please provide their titles. If the individuals are principals of a different entity/company, please identify the entity/company.

Supplemental Response to Interrogatory No. 16 identifies two persons in Peru by name and as "Principal" being those who participated in creating or distributing advertisements or promotions for Respondent's products under its mark. This title is unclear in terms of Respondent, Milano Bags Inc., a corporation of Florida. If the individuals identified are officers of Milano Bags, Inc., please provide their titles. If the individuals are principals of a different entity/company, please identify the entity/company. Further, the Interrogatory requests the period of time during which each person participated in such activities, to which there is no response.



Supplemental Response to Interrogatory No. 17 identifies two persons in Peru by name and as "Principal" being those who supplied documents or information or participated in responding to Milano Series' First Set of Interrogatories and First Request for Production. This title is unclear in terms of Respondent, Milano Bags Inc., a corporation of Florida. If the individuals identified are officers of Milano Bags, Inc., please provide their titles. If the individuals are principals of a different entity/company, please identify the entity/company.

Also, the Supplemental Response identifies a third person, but no title or position was provided for him.

Further, the "counsel" referred to in Respondent's original response to Interrogatory No. 17 are not identified.

Supplemental Response to Request for Production No. 1 requesting each document, thing, or electronically stored information (hereinafter "document") identified in response to Petitioner's First Set of Interrogatories states "None" when Respondent's original and supplemental response to Interrogatory No. 1 both refer to a contract between Studio Moda SAC and Respondent, Milano Bags Inc.

Supplemental Response to Request for Production No. 9 requesting each document referring to any assignment, etc. granted to Respondent to use the mark MILANO BAGS. Respondent states "None" when Respondent's original and Supplemental Response to Interrogatory No. 1 both refer to a contract between Studio Moda SAC and Respondent, Milano Bags Inc., regarding use of the mark in the United States.

Supplemental Response to Request for Production No. 10 requesting representative sample labels, tags, packaging, etc. for Respondent's products that bear Respondent's mark. Respondent states: "000008-000037, 000045-000072." Each of Respondent's documents numbered 000023, 000050, 000054 - 000060, 000064 and 000072 are illegible. Legible copies are requested. For all documents which are labels, tags, etc., the reverse side of each such label, tag, etc. should be provided. (For example, documents numbered 000021, 000061, 000067, and 000069 - 000072.)

Supplemental Response to Request for Production No. 11 requesting representative specimens of current and/or proposed advertising or promotional documents and electronic media that bear Respondent's mark. Respondent states: "000008-000016, 000020 - 000034, 000054 - 000067, 000072." As above, Respondent's documents numbered 000023, 000050, 000054 - 000060, 000064 and 000072 are illegible. Legible copies are requested. For all documents which are labels, tags, etc., the reverse side of each such label, tag, etc. should be provided. (For example, documents numbered 000021, 000061, 000067, and 000069 - 000072.)

**We look forward to receiving your substantive response to the above by November 15, 2013. If you are not able to provide the requested information and documents by then, please let us know by return email when you expect to do so. In the meantime, kindly also confirm receipt of this email by return email.**

Regards, Robin

Robin Bren  
Oblon Spivak  
703-412-6413

# **EXHIBIT 4**

## Beth A. Chapman

---

**From:** Matthew H. Swyers <mswyers@thetrademarkcompany.com>  
**Sent:** Tuesday, December 03, 2013 3:58 PM  
**To:** Robin Bren  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '406676US \_ MILANO BAGS E\_Mails'  
**Subject:** RE: Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]

Robin:

Without conceding your concerns regarding discovery, you do have my consent to the further suspension requested.

Kindly copy me via email.

Thank you,

### **Matthew H. Swyers**

The Trademark Company, PLLC  
344 Maple Avenue West, PBM 151  
Vienna, VA 22180 USA  
Phone (800) 906-8626 x100  
Facsimile (270) 477-4574  
www.TheTrademarkCompany.com

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*The Trademark Company PLLC is a Virginia Professional Limited Liability Company, Matthew H. Swyers, Esq. principal. Principal admitted to practice law in the Commonwealth of Virginia and the District of Columbia. Practice limited to the federal protection of trademarks and copyrights.*

---

**From:** Robin Bren [mailto:RBren@oblon.com]  
**Sent:** Tuesday, December 03, 2013 10:58 AM  
**To:** msywers@thetrademarkcompany.com  
**Cc:** Beth A. Chapman; Nicole M. Dyson; 406676US \_ MILANO BAGS E\_Mails  
**Subject:** RE: Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]  
**Importance:** High

Our Ref: 406676US-10398-35

Dear Matt:

I understand you are in the office today although I was not able to get through to you by phone. I left a voice mail message requesting you get back to me regarding the requested further suspension of the case in light of the outstanding discovery issues. I would appreciate hearing from you by return email or phone.

Regards, Robin

Robin Bren  
Oblon Spivak  
(703)412-6413

---

**From:** Robin Bren  
**Sent:** Monday, December 02, 2013 1:35 PM  
**To:** 'mswyers@thetrademarkcompany.com'  
**Cc:** Beth A. Chapman (BChapman@oblon.com); 'Nicole M. Dyson'; '406676US \_ MILANO BAGS E\_Mails'  
**Subject:** RE: Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]  
**Importance:** High

Our Ref: 406676US-10398-35

Dear Matt:

I have not heard back from you and the case is scheduled to resume 7 December 2013. Inasmuch as the discovery issues have not been resolved, kindly confirm that you agree to a further three month suspension of the dates, per our agreement as set forth in the prior filed Consented Motion to Suspend.

Regards, Robin

---

**From:** Robin Bren  
**Sent:** Monday, November 04, 2013 6:00 PM  
**To:** 'mswyers@thetrademarkcompany.com'  
**Cc:** Beth A. Chapman (BChapman@oblon.com); 'Nicole M. Dyson'; '406676US \_ MILANO BAGS E\_Mails'  
**Subject:** Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]  
**Importance:** High

Our Ref: 406676US-10398-35

Dear Matt:

This is further to my October 20, 2013 email again requesting you advise me when you would be available to discuss Milano Bags' Supplemental Responses to Milano Series' First Set of Interrogatories and First Request for Production of Documents. I received no response. We do not believe that your approach is consistent with the directive from the Board.

Initially, we note the following remaining deficiencies.

Milano Series' First Set of Interrogatories- to be answered under oath

**Both** Milano Bags' original Responses and its Supplemental Responses must be signed under oath by an officer of Respondent corporation. You stated in our September 6, 2013 telephone conference that would be done. It was not.

which are labels, tags, etc. , the reverse side of each such label, tag, etc. should be provided. (For example, documents numbered 000021, 000061, 000067, and 000069 – 000072.)

**We look forward to receiving your substantive response to the above by November 15, 2013. If you are not able to provide the requested information and documents by then, please let us know by return email when you expect to do so. In the meantime, kindly also confirm receipt of this email by return email.**

Regards, Robin

Robin Bren  
Oblon Spivak  
703-412-6413

# **EXHIBIT 5**

## Nicole M. Dyson

---

**From:** Robin Bren <RBren@oblon.com>  
**Sent:** Tuesday, December 10, 2013 8:53 AM  
**To:** Matthew H. Swyers  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '406676US \_ MILANO BAGS E\_Mails'  
**Subject:** Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]

**Importance:** High

Dear Matt:

Per my email below, kindly provide contact information so that our clients may consider a business to business resolution.

I would also appreciate the courtesy of a response to my email regarding the discovery issues.

Regards, Robin

---

**From:** Robin Bren  
**Sent:** Wednesday, December 04, 2013 3:01 PM  
**To:** 'Matthew H. Swyers'  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '406676US \_ MILANO BAGS E\_Mails'  
**Subject:** RE: Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]

Dear Matthew:

Thank you for getting back to me regarding the further suspension. A copy of the Motion is attached.

Kindly let me know when I may expect to hear from you in response to my email of a month ago regarding the outstanding discovery issues.

In the meantime, perhaps our clients will have more success in bridging the gap than we have had. To that end, **please provide contact information so that our clients may consider a business to business resolution.**

Regards, Robin

---

**From:** Matthew H. Swyers [<mailto:mshwyers@thetrademarkcompany.com>]  
**Sent:** Tuesday, December 03, 2013 3:58 PM  
**To:** Robin Bren  
**Cc:** Beth A. Chapman; Nicole M. Dyson; '406676US \_ MILANO BAGS E\_Mails'  
**Subject:** RE: Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]

Robin:

Without conceding your concerns regarding discovery, you do have my consent to the further suspension requested.

Kindly copy me via email.

Thank you,

## **Matthew H. Swyers**

The Trademark Company, PLLC  
344 Maple Avenue West, PBM 151  
Vienna, VA 22180 USA  
Phone (800) 906-8626 x100  
Facsimile (270) 477-4574  
[www.TheTrademarkCompany.com](http://www.TheTrademarkCompany.com)

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*The Trademark Company PLLC is a Virginia Professional Limited Liability Company, Matthew H. Swyers, Esq. principal. Principal admitted to practice law in the Commonwealth of Virginia and the District of Columbia. Practice limited to the federal protection of trademarks and copyrights.*

---

**From:** Robin Bren [<mailto:RBren@oblon.com>]  
**Sent:** Tuesday, December 03, 2013 10:58 AM  
**To:** [mswyers@thetrademarkcompany.com](mailto:mswyers@thetrademarkcompany.com)  
**Cc:** Beth A. Chapman; Nicole M. Dyson; 406676US \_ MILANO BAGS E\_Mails  
**Subject:** RE: Milano Series International Products, Ltd. v. Milano Bags Inc. (MILANO BAGS) [IWOV-iManageDB.FID3578531]  
**Importance:** High

Our Ref: 406676US-10398-35

Dear Matt:

I understand you are in the office today although I was not able to get through to you by phone. I left a voice mail message requesting you get back to me regarding the requested further suspension of the case in light of the outstanding discovery issues. I would appreciate hearing from you by return email or phone.

Regards, Robin

Robin Bren  
Oblon Spivak  
(703)412-6413

---

**From:** Robin Bren  
**Sent:** Monday, December 02, 2013 1:35 PM



please provide their titles. If the individuals are principals of a different entity/company, please identify the entity/company.

Supplemental Response to Interrogatory No. 16 identifies two persons in Peru by name and as "Principal" being those who participated in creating or distributing advertisements or promotions for Respondent's products under its mark. This title is unclear in terms of Respondent, Milano Bags Inc., a corporation of Florida. If the individuals identified are officers of Milano Bags, Inc., please provide their titles. If the individuals are principals of a different entity/company, please identify the entity/company. Further, the Interrogatory requests the period of time during which each person participated in such activities, to which there is no response.

Supplemental Response to Interrogatory No. 17 identifies two persons in Peru by name and as "Principal" being those who supplied documents or information or participated in responding to Milano Series' First Set of Interrogatories and First Request for Production. This title is unclear in terms of Respondent, Milano Bags Inc., a corporation of Florida. If the individuals identified are officers of Milano Bags, Inc., please provide their titles. If the individuals are principals of a different entity/company, please identify the entity/company.

Also, the Supplemental Response identifies a third person, but no title or position was provided for him.

Further, the "counsel" referred to in Respondent's original response to Interrogatory No. 17 are not identified.

Supplemental Response to Request for Production No. 1 requesting each document, thing, or electronically stored information (hereinafter "document") identified in response to Petitioner's First Set of Interrogatories states "None" when Respondent's original and supplemental response to Interrogatory No. 1 both refer to a contract between Studio Moda SAC and Respondent, Milano Bags Inc.

Supplemental Response to Request for Production No. 9 requesting each document referring to any assignment, etc. granted to Respondent to use the mark MILANO BAGS. Respondent states "None" when Respondent's original and Supplemental Response to Interrogatory No. 1 both refer to a contract between Studio Moda SAC and Respondent, Milano Bags Inc., regarding use of the mark in the United States.

Supplemental Response to Request for Production No. 10 requesting representative sample labels, tags, packaging, etc. for Respondent's products that bear Respondent's mark. Respondent states: "000008-000037, 000045-000072." Each of Respondent's documents numbered 000023, 000050, 000054 - 000060, 000064 and 000072 are illegible. Legible copies are requested. For all documents which are labels, tags, etc., the reverse side of each such label, tag, etc. should be provided. (For example, documents numbered 000021, 000061, 000067, and 000069 - 000072.)

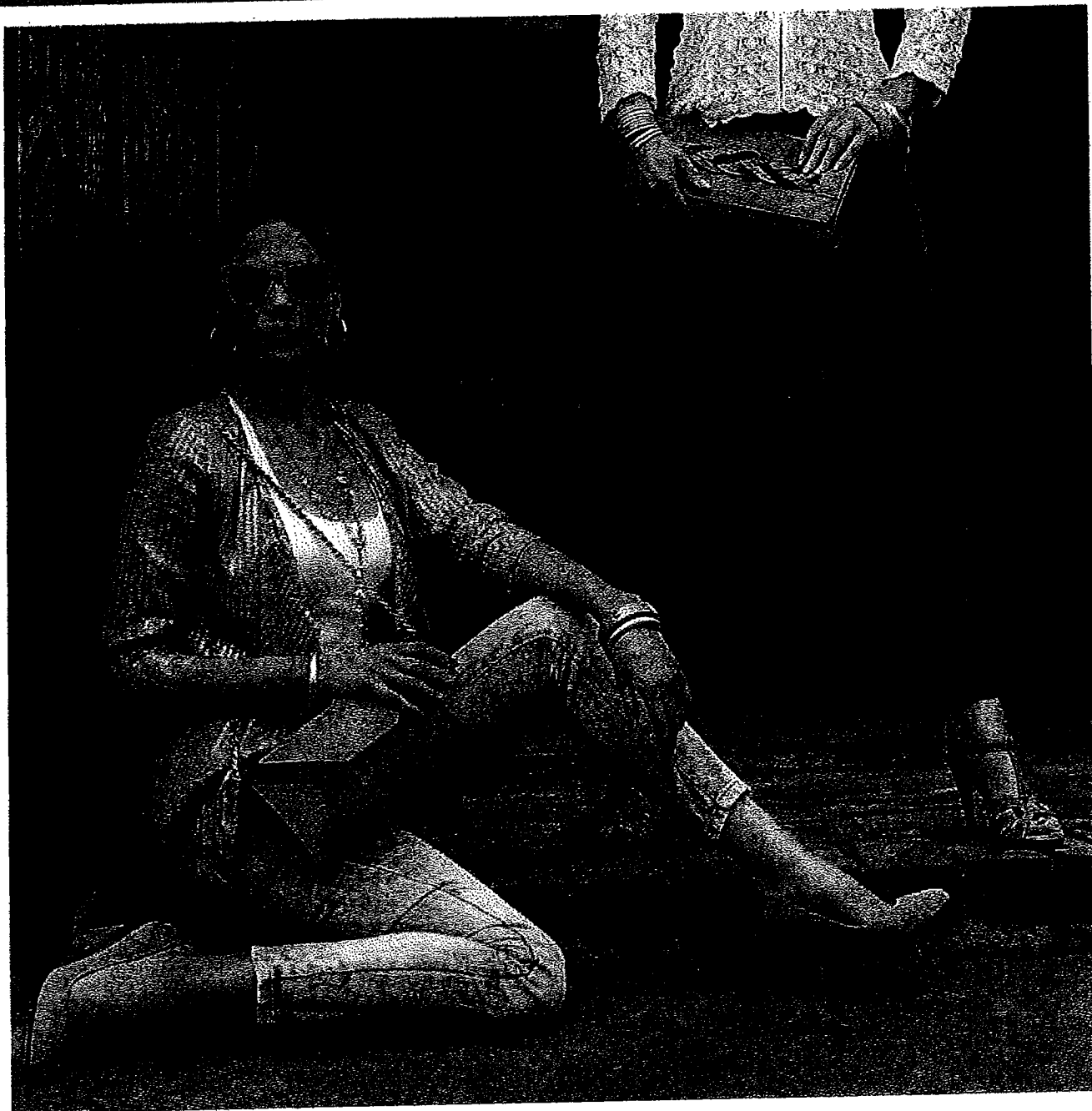
Supplemental Response to Request for Production No. 11 requesting representative specimens of current and/or proposed advertising or promotional documents and electronic media that bear Respondent's mark. Respondent states: "000008-000016, 000020 - 000034, 000054 - 000067, 000072." As above, Respondent's documents numbered 000023, 000050, 000054 - 000060, 000064 and 000072 are illegible. Legible copies are requested. For all documents which are labels, tags, etc., the reverse side of each such label, tag, etc. should be provided. (For example, documents numbered 000021, 000061, 000067, and 000069 - 000072.)

**We look forward to receiving your substantive response to the above by November 15, 2013. If you are not able to provide the requested information and documents by then, please let us know by return email when you expect to do so. In the meantime, kindly also confirm receipt of this email by return email.**

Regards, Robin


Robin Bren  
Oblon Spivak  
703-412-6413

# **EXHIBIT 6**



# MB

## MILANO BAGS

[www.milano-bags.com](http://www.milano-bags.com)  
 [www.facebook.com/milano-bags](https://www.facebook.com/milano-bags)

000023



**September 14-16, 2010**  
1414 NW 107 Ave. • Suite 315 • Miami, FL 33172  
Phone 786.331.9000 • Fax 786.331.9955  
www.smota.com

**OFFICE USE ONLY**

CK # \_\_\_\_\_ App. # \_\_\_\_\_  
SMOTA \_\_\_\_\_ Inv. # \_\_\_\_\_  
RC \_\_\_\_\_ Board \_\_\_\_\_ FI Plan \_\_\_\_\_  
Hotel \_\_\_\_\_ Showroom \_\_\_\_\_  
Last Location \_\_\_\_\_  
Points \_\_\_\_\_ No. of Booths \_\_\_\_\_

**MEMBER'S INFORMATION & PAYMENT SUMMARY**

Member's Information Member's Name \_\_\_\_\_

Address \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

City \_\_\_\_\_

Phone \_\_\_\_\_ Cellular \_\_\_\_\_ Fax \_\_\_\_\_

E-mail \_\_\_\_\_ Signature \_\_\_\_\_

I agree to uphold rules and regulations set forth by SMOTA as outlined on the market contract terms.

Exhibitor must be a member of SMOTA.

Deadline: July 12, 2010 • \$50 Late Registration Penalty. Read carefully! Fill out entire contract. All dues, registration fees, booth fees and sign fees must be enclosed or contract will be returned. Postdated checks will not be accepted.

**Payment Summary**

Market fee per person ..... x \$175 ea.

Booth Exhibitors Only ..... x \$645 ea.

Booth Charge ..... x \$560 ea.

\*Raw Booth Charge ..... x \$560 ea.

\*For Raw Booths Only - Subject to SMOTA Approval

Fashion Avenue Exhibitors Only ..... x \$1,950 ea.

Showrooms ..... x \$645 ea.

Fashion Square Booths ..... x \$645 ea.

Hotel Exhibitors ..... \$175

Hotel Assessment ..... \$175

If Applicable ..... \$20

Postcards ..... \$50

Late Fee ..... \$45

SMOTA 2010 DUES ..... \$100

Initiation Fee (for new members) ..... \$100

**Advertising Rates**

Column Wraps ..... \$500

Full page(s) in color ..... \$200

Inside front or back cover in color ..... \$350

Back Cover in color ..... \$400

Center spread in color ..... \$400

Add 3.25% for Amex charges or 2.48% for Visa/Mastercard charges.....

TOTAL ..... \$1,225.00

**Form of Payment**

☐ Check ☐ Cash ☐ Visa ☐ MasterCard ☐ American Express Acct # \_\_\_\_\_

Exp. Date 03/11 Signature \_\_\_\_\_

Make Check Payable to: Shoe Market of the Americas • Mail original to SMOTA and keep yellow copy for your records.

**Preferred Exhibit Space**

1st Choice \_\_\_\_\_ 2nd Choice \_\_\_\_\_ 3rd Choice \_\_\_\_\_

**Hotel Exhibitor Only**

Room Deposit Hilton Ft. Lauderdale Marina • Room rate: \$109.00 + tax. There is a four night minimum for all exhibit rooms.

**Credit Card Info**

Name: Arrival/Departure Date: \_\_\_\_\_ (For hotel exhibitors only) Expiration Date: \_\_\_\_\_

Card # \_\_\_\_\_

000000

MILANO BAGS



Productos

Características

Información

Newsletter

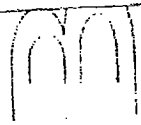
Ventanas de Moda

Trucos

50 Colección

El Día Más Especial

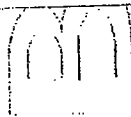
REQUEST  
Nº 6 y  
12



STUDIO MODA  
MILANO BAGS

ANDRÉS HAARUP

DESIGNER  
EL DÍA MÁS ESPECIAL



STUDIO MODA  
MILANO BAGS

ANDRÉS HAARUP

DESIGNER  
EL DÍA MÁS ESPECIAL

000054

## MILANO BAGS

Home - About Us

## About Us

## MILANO BAGS S.p.A.

We are a company dedicated to the manufacturing of fashionable, sophisticated, and essentially rock and roll leather products, including handbags, briefcases, belts, wallets, and accessories.

Our Collections have consolidated our style of these products, adding the latest trends, designs, and accessories that match the sophisticated look. It's approach certainly an advantage in today's competitive market. All our products are almost perfect.

## Production Location

Versatility and adaptability allow us to serve customers of every size and from any part of the world. Our management team is adequately prepared to deliver a high level of customer service.

## MILANO BAGS

Milano Bags is a brand of products with a distinctive design, innovative with special emphasis on the quality, control and maintenance of our products, to ensure delivery a high and efficient production of all goods. Offer a unique, positive and emotional shopping experience.

## VISION

Milano Bags will be a brand recognized globally for the quality of its products and the special combination of their design and style.



000055

12/02/13

Tiendas - Milano Bags

MILANO BAGS

Home

Search

My Account

Home

Home

Home

Home

Home

Home

Home

Home

Home

12/02/13

000056

12/02/13

## MILANO BAGS

Milano Bags

### About Us

#### SOCIAL RESPONSIBILITY

It is the duty of the company and its employees to ensure that the company is a constant source of social and economic value for the community in which it operates.

The company is aware of the importance of environmental management in its business. The company uses high quality, durable, and safe materials in the manufacturing of its products as well as reducing the use of synthetic materials, leather, and other materials in its production process. The company is committed to the protection of the environment and the use of recycled materials in its production process.

The company is committed to the use of high quality materials in its production process. The company is committed to the use of high quality materials in its production process. The company is committed to the use of high quality materials in its production process.

Milano Bags is committed to the use of high quality materials in its production process. The company is committed to the use of high quality materials in its production process. The company is committed to the use of high quality materials in its production process.



000057

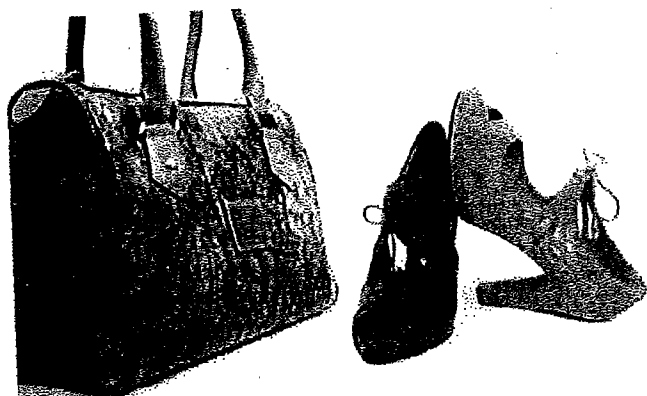


12/02/13

Newsletter - Mens Wear | Milano Bags

MILANO BAGS

May 1988



126

Newsletter

Mens Wear

Military

Flat Out

Clogs and Loafers

Over the Knee

Super Feminine

Riding Boots



000058

MILANO BAGS



Fashion Windows

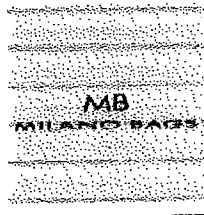
- Sandals
- Hats
- Pumps
- Boots
- Boaties
- Platform
- Working Shoes
- Handbags
- Belts
- Wallets
- Small Goods
- Office Line



000059

Happy  
Valentine's

¡Feliz día de San Valentín!  
¡Milano Bags te ofrece un regalo especial!

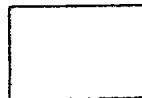


### Milano Bags

A 33.189 personas les gusta esta página • 3.719 personas están hablando sobre esto

**Negocio local**  
LIMA, AREQUIPA, ICA, TUMBES, CHICLAYO, TACNA.  
<http://WWW.MILANOBAGS.COM>

Información



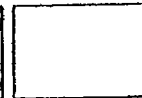
Fotos

Me gusta

33.189

Las ganadoras de  
Bags!  
¡Felicidades y muchas  
gracias a todas por

Hoyas 15



Videos

Lo más destacado

Publicación

Foto / video

74 amigos  
Indicaron que les gusta Milano Bags



Anuncios

San Valentín  
Bombón Rojo



Regalos excitantes para  
el día del amor. Lencería  
y disfraces sensuales  
[bombonrojo.com](http://bombonrojo.com)

Me gusta

Alejandro Sana



Alejandro Sana 26 de  
febrero en el estado  
nacional 10% de dto  
con tarjetas Interbank

Me gusta

Ahora

enfo

2012

2011

2010

Se unió a Facebook

Milano Bags  
Hace aproximadamente una hora

¡Felicidades a la ganadora de packs de productos Milano Bags! y mil gracias a todas por participar ¡Feliz San Valentín!

Happy  
Valentine's

¡Felicitaciones!

Milano Bags te felicita por haber ganado el  
gran concurso Happy Valentine's de  
Milano Bags

¡Gánate un box con los datos para participar a obtener los  
datos de regalo para el día del amor!

Me gusta • Comentar • Compartir

A 14 personas les gusta esto.

Ver 2 comentarios más



Cecilia Torres felicitades

Hace aproximadamente una hora • Me gusta



Milano Bags  
Hace 3 horas

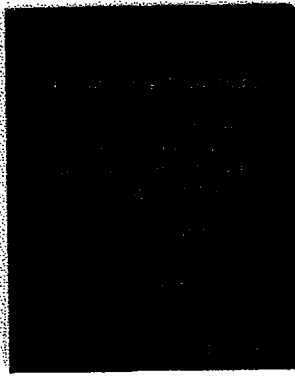
Publicaciones recientes de otras personas en Milano Bags

Ver todas

000000

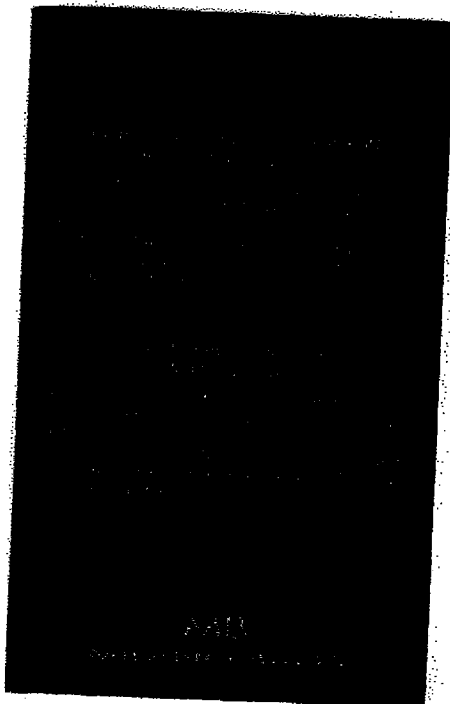
[illegible]

A dark, grainy photograph showing a person's arm and hand. The hand is holding a small, light-colored rectangular object, possibly a tag or a small book. The object has text printed on it, which is partially legible as "ABE" and "100-50000". The background is dark and textured.



MILANO BAGS

MENS MB COLLECTION



MB  
MILANO BAGS

000072

# **EXHIBIT 7**


REQUEST  
Nº 11



*I love  
my mami*

*¡Feliz día mamá!*

**MB**  
MILANO BAGS

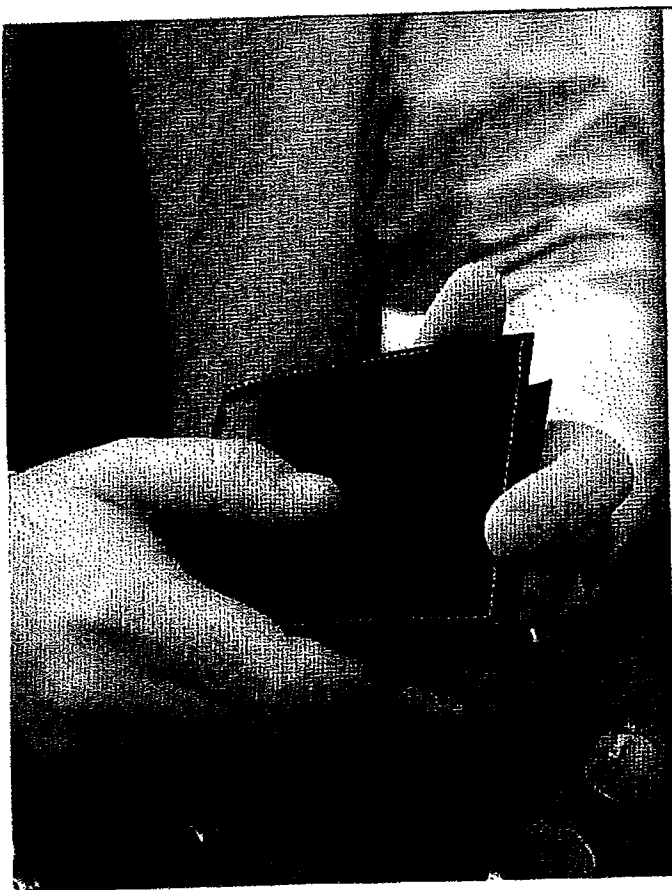


**MB**  
MILANO BAGS

Nueva Temporada

Lima - Conquistadores 584, San Isidro • C.C. El Polo Tda. 129, Montemayo  
Larcomar Tda. 105, Miraflores • Próximamente C.C. Plaza San Miguel  
Ica - C.C. Plaza del Sol, Local 234

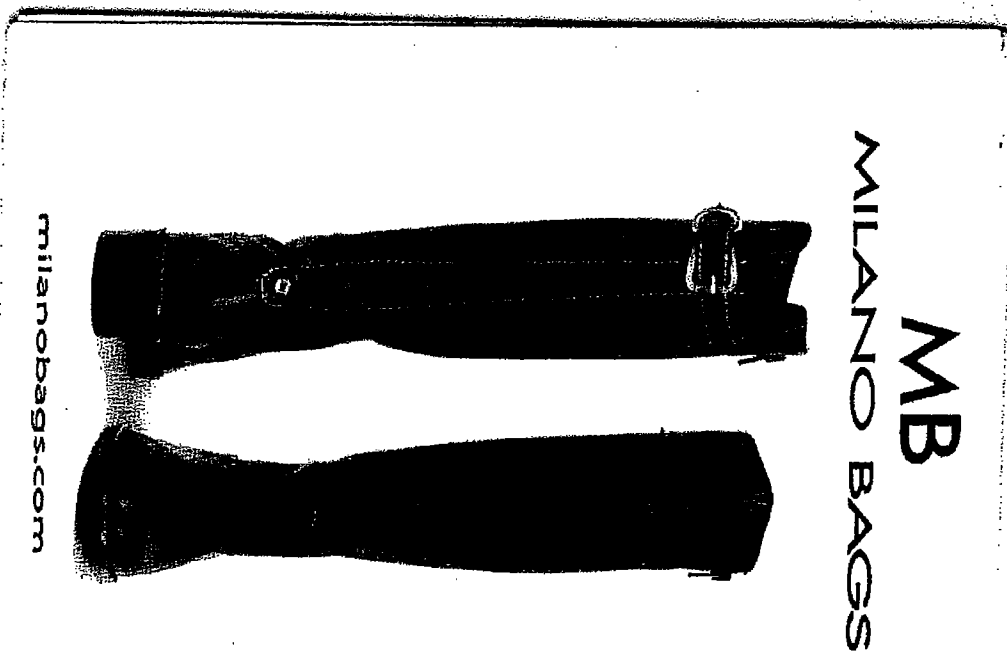
000021



*¡Feliz día  
papá!*

**MB**  
**MILANO BAGS**

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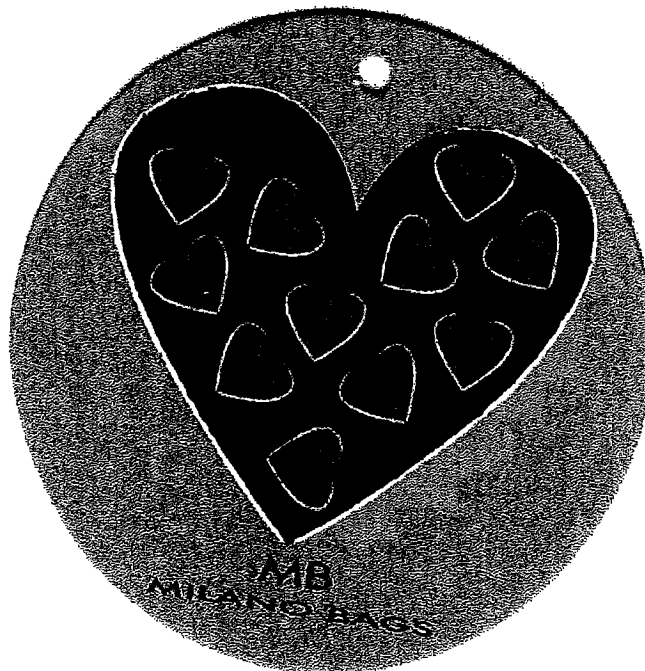
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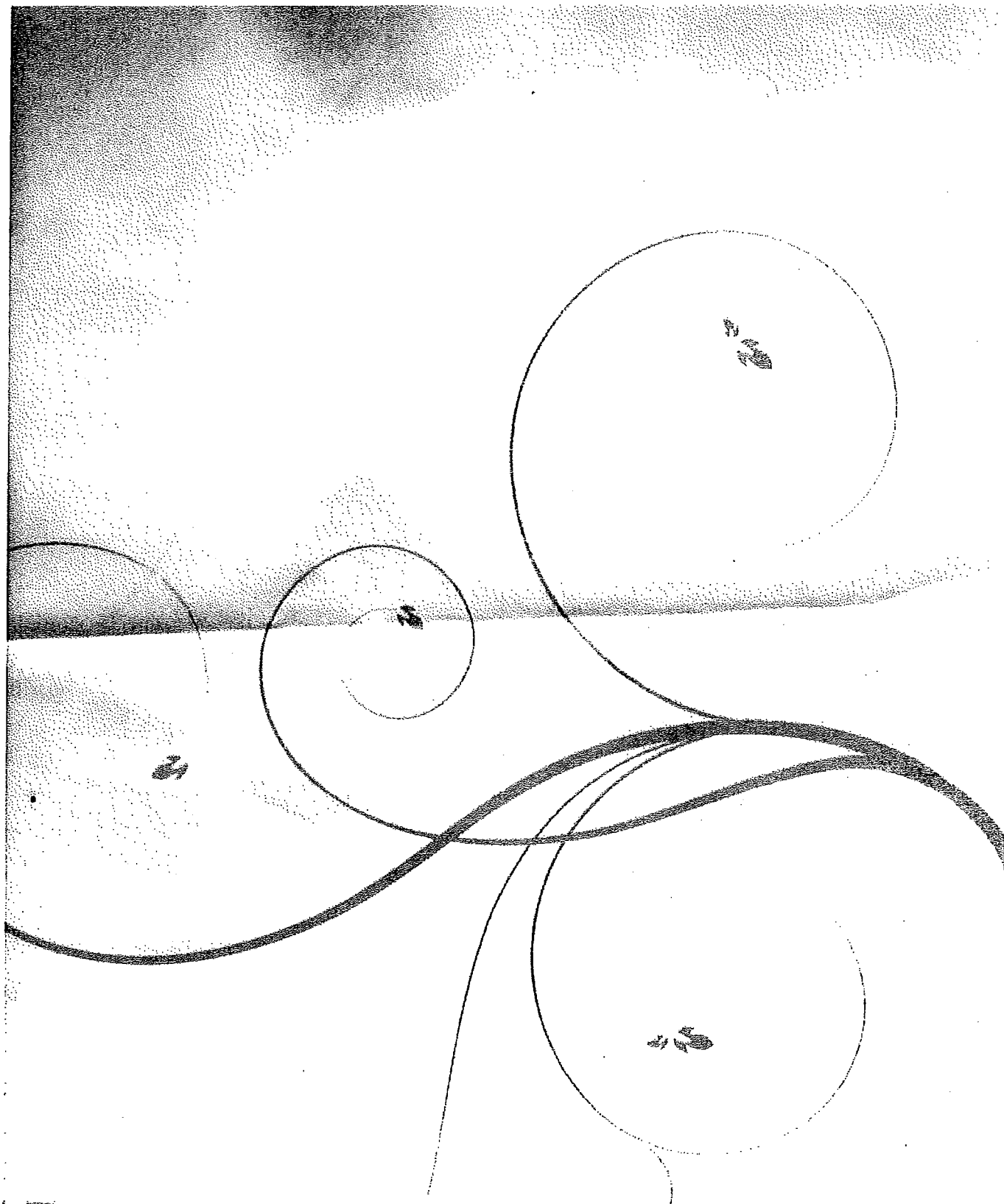
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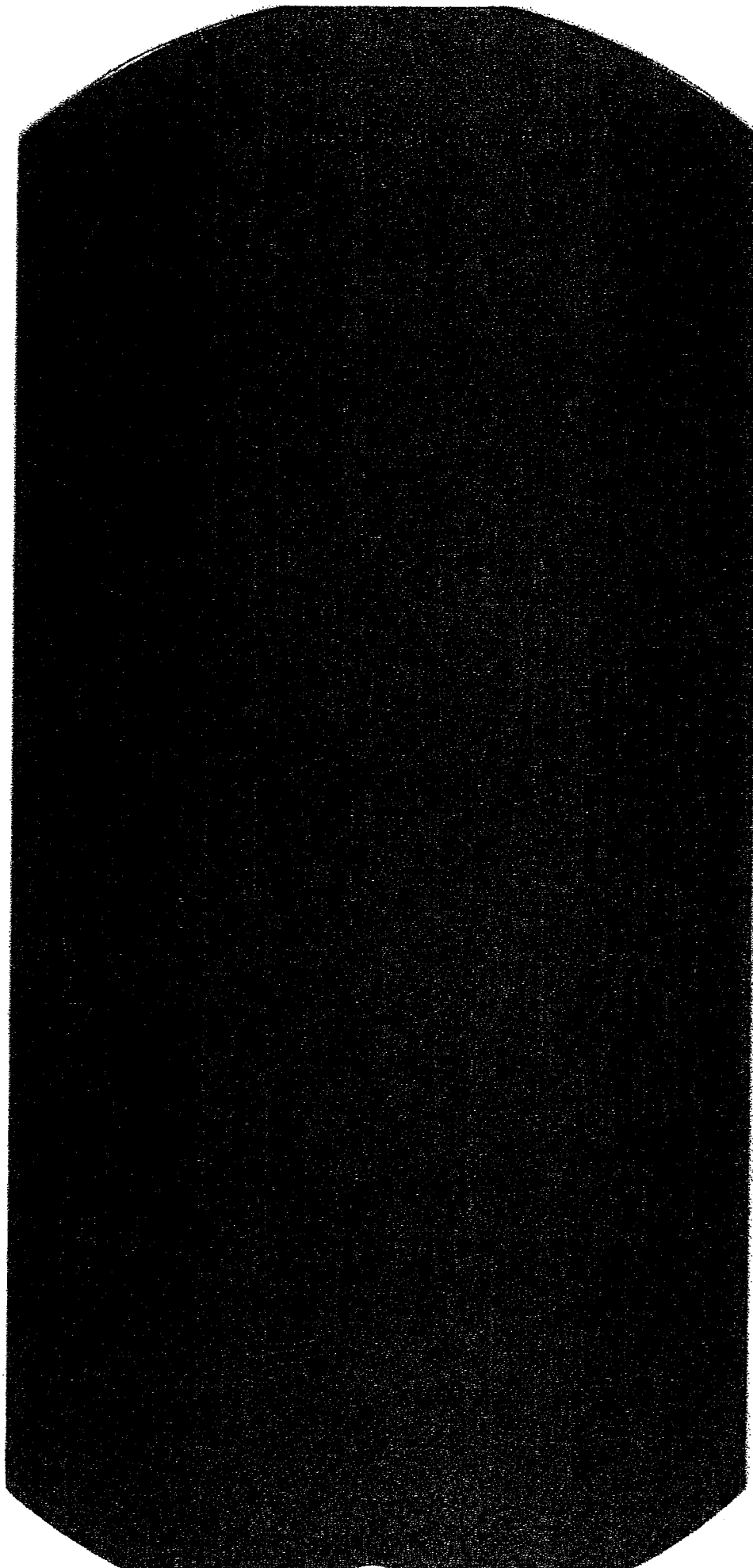


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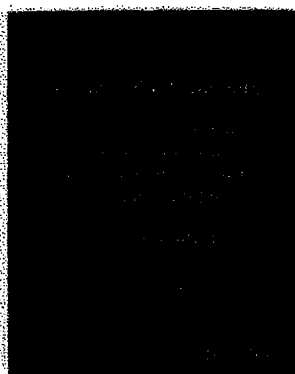
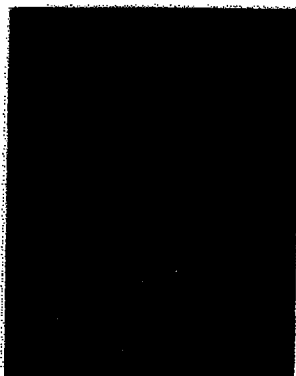
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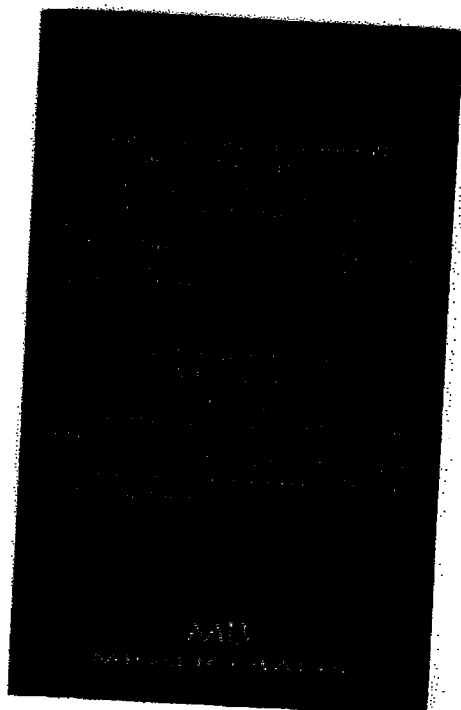


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